

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	Criminal No. 4-24-CR-608
	§	
JOEY LAMAR ELLIS	§	

JOINT MOTION TO CONTINUE

The United States of America through Nicholas J. Ganjei, United States Attorney, and Sharad S. Khandelwal and Eun Kate Suh, Assistant United States Attorneys, and Defendant Joey Lamar Ellis, through his counsel, Darryl Austin, respectfully move that the Court continue the current motions and trial schedule and set a status hearing on or about September 15, 2025, or some other date the Court deems appropriate, at which time the Court and the parties can discuss whether a trial schedule should be set or whether an additional continuance is needed.

1. On December 3, 2024, a federal grand jury returned an Indictment charging the Defendant with twenty counts, which range from federal civil rights violations to possession of a firearm during a crime of violence to obstruction of justice. That Indictment concerned eight separate victims who had dealt with the Defendant on at least nine separate events spanning over a period of time from

February to June 2024. *See* Docket #1.

2. In sum, this Indictment alleges that the Defendant worked for the City of Houston as an urban park ranger and that he abused his authority by detaining people in various city parks at night, accusing them of committing crimes, and demanding they pay him money or else be arrested, have their car impounded, be thrown into jail, and be charged with felonies. The Indictment further alleges that the Defendant pretended to be a police officer or its equivalent in these encounters, and that he would not allow his victims to leave until they paid him. Furthermore, the Indictment charges that, on some of these encounters, the Defendant possessed and brandished a firearm that he was not supposed to have as part of his City of Houston job. It also alleges that in some of these encounters, the Defendant physically assaulted his victims. It further alleges that in some of these encounters, the Defendant sexually abused and assaulted his victims.

3. The Defendant was subsequently arrested and ordered detained pending trial following a detention hearing on December 12, 2024. *See* Docket #7, 14.

4. On January 13, 2025, the Court granted the United States' unopposed motion to designate the case as complex and for a continuance. *See* Docket #20. At that time, the Court set a pretrial conference date for May 12, 2025, and a trial date for May 19, 2025. *See id.*

5. The parties respectfully file this request for a continuance of the current trial calendar and requests that the Court set this case for a status hearing on or about September 15, 2025, or some other date the Court deems appropriate, at which time the Court and the parties can discuss whether a trial schedule should be set or whether an additional continuance is needed.

6. The grand jury continues to investigate this case. At this time, the United States has identified approximately twenty victims that it anticipates including in a superseding indictment. Furthermore, the United States continues to identify additional new victims as its investigation progresses. As such, the United States expects to present at least one superseding indictment in this case addressing the Defendant's conduct towards numerous additional victims.

7. Furthermore, discovery in this case has already proven to be voluminous. With additional victims still being identified, however, that discovery is only expected to grow larger and to become more complex.

8. Additional time is needed to allow this investigation to come to its natural conclusion, and for the Defendant to receive and review discovery. Accordingly, the parties jointly request that the Court continue all deadlines, and issue a revised Scheduling Order setting a status hearing date on or about September 15, 2025, or some other date the Court deems appropriate, considering the matters

stated herein.

9. The parties have conferred about this motion, and the Defendant joins the United States in filing this motion. The Defendant acknowledges that this continuance will toll the time limits under the Speedy Trial Act.

Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney

By: /s/ Sharad S. Khandelwal
SHARAD S. KHANDELWAL
EUN KATE SUH
Assistant United States Attorneys
U.S. Attorney's Office, S.D. Texas
Tel: (713) 567-9000

Certificate of Service

I certify that, on the date this was filed with the Court, a copy of the foregoing was provided to counsel for defendant via ECF and/or e-mail.

/s/ Sharad S. Khandelwal
SHARAD S. KHANDELWAL
Assistant U.S. Attorney

Certificate of Conference

I certify that undersigned counsel for the United States spoke to counsel for the Defendant, who joins in this motion.

/s/ Sharad S. Khandelwal
SHARAD S. KHANDELWAL
Assistant U.S. Attorney